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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

TASH HEPTING, GREGORY HICKS, CAROLYN JEWEL and ERIK KNUTZEN, on Behalf of Themselves and All Others Similarly Situated, Plaintiffs, v. AT&T CORP., et al., Defendants.	No. C-06-0672-VRW **CLASS ACTION** **DECLARATION OF ELENA M. DIMUZIO IN SUPPORT OF ADMINISTRATIVE MOTION TO LODGE DOCUMENTS WITH THE COURT (N.D. CAL. CIVIL LOCAL RULES 7-11, 79-5).** Courtroom: 6, 17th Floor Judge: The Hon. Vaughn R. Walker, Chief Judge

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I, Elena M. DiMuzio, hereby declare:

1. I am an attorney with the law firm of Heller Ehrman LLP, counsel of record for Plaintiffs in this action. I am licensed to practice before this Court and I have personal knowledge of the facts stated herein, unless otherwise indicated.

2. AT&T has maintained that information discussed in Plaintiffs' Demonstrative Presentation is trade secret information. Plaintiffs have submitted a proposed protective order to Defendants, but Defendants have not yet agreed to the proposal or suggested changes to the proposed order. Plaintiffs will continue to meet and confer with Defendants in an attempt to come to agreement on a protective order for documents in this case.

3. The alleged trade secret information discussed in Plaintiffs' Demonstrative Exhibits is already filed under seal with the Court in the Klein and Marcus Declarations (Docket Numbers 31 and 32 respectively).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of June, 2006, at San Francisco, California.

/s/
Elena M. DiMuzio

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the following non-CM/ECF participants:

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